

September 9, 1981

IFES/SECO Products  
P.O. Box 187  
Washington, MO 63090

Dear Sir:

Enclosed please find a copy of the Resource Conservation and Recovery Act Compliance Inspection Report. In reviewing the inspection report and your files, numerous violations to the hazardous waste law and regulations are evident. To avoid further actions by the Department of Natural Resources, the following requirements listed below must be accomplished and documentation submitted to this office and the St. Louis Regional Office by the given date:

1. Waste Analysis Plan according to 40 CFR 265.13 by October 30, 1981. According to 40 CFR 265.13 (a) (2), this analysis may include data under 40 CFR 261 or other published material;
2. Personnel training for all employees who handle hazardous waste. Submit copies of the various documents required under 40 CFR 265.16 (d) (1) through (3) by October 30, 1981. Portions of the Contingency Plan and Emergency Procedures should be included in the training;
3. A Written Inspection Log as required under 40 CFR 265.15, 265.174, and 265.226 by October 30, 1981;
4. A Contingency Plan as required under 40 CFR 265, Subpart D by October 30, 1981;
5. An Operating Record as required under 40 CFR 265.73 by October 30, 1981;
6. A Closure Plan and financial requirements as required under 40 CFR 265 Subparts G and H by October 30, 1981. Subpart H, "Financial Requirements", will be amended in a soon to be released Federal Register. This amended subpart will give treatment-storage-disposal facilities various options for meeting the financial requirements necessary to insure closure of the facility. This becomes effective October 13, 1981;
7. Register with this office as a generator of hazardous waste by October 16, 1981 (see enclosed form HWG-1 and HWG-1A);

MISSOURI DEPARTMENT OF NATURAL RESOURCES  
P.O. Box 1368 1915 Southridge Drive Jefferson City, Missouri 65102 (314) 751-3241

Christopher S. Bond Governor  
Fred A. Lafser Director

Division of Environmental Quality  
Robert J. Schreiber Jr., P.E. Director



R00348926  
RCRA RECORDS CENTER

IFES/SECO Products  
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8. Bring into compliance the drum storage area by October 16, 1981. The following along with recommendation number 5 are specific requirements necessary to be in compliance:
  - A. Store drummed hazardous waste in closed DOT approved containers that do not leak. Transfer content in leaking drums if necessary.
  - B. If hazardous waste is ignitable, it must be stored at a location greater than fifty (50) feet from the nearest property line; and
  - C. Complete labeling and marking according to 40 CFR 262, Subpart C;
9. Install signs as described in 40 CFR 265.14 at the entrance to each hazardous waste storage area by October 16, 1981;
10. Complete recommendation number 6 by January 4, 1982.

If you have any questions concerning this letter or the enclosed inspection report, or if we can be of any service to you, don't hesitate to contact either Paul Meiburger at this office or the personnel at the St. Louis Regional Office.

Sincerely,

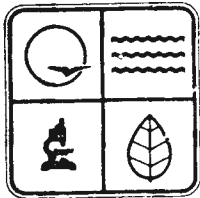
*PE Phillips*

Patrick E. Phillips, Chief  
Hazardous Waste Management Section  
Solid Waste Management Program

PEP/PM/bki

Enclosure

cc: W.M. McNutt, Heinicke and These Consulting Engineers  
Bob Zeman, St. Louis Regional Office  
David Doyle, U.S. EPA Region VII, Enforcement Division



27.020 Frankl County  
Hazardous Waste Generator  
IFES/SECO Products  
July 13, 1981

RCRA COMPLIANCE INSPECTION REPORT

FACILITY

IFES/SECO Products  
P.O. Box 187  
Washington, Missouri 63090  
(314) 239 4788  
MO Generator ID: 01585  
EPA ID: MODO68549492

RECEIVED

JUL 21 1981

SOLID WASTE  
MANAGEMENT PROGRAM

INTRODUCTION:

A RCRA compliance inspection was conducted at the IFES/SECO Products facility, Washington, Missouri on June 10, 1981. Missouri Department of Natural Resources representatives included Mike Duvall and Ken Gambaro. Mr. Larry Colvin, plant engineering coordinator and Mr. W. M. McNutt, consultant to the company, represented IFES/SECO.

The facility is involved in the manufacture of food service equipment, which consists of deep drawing and fabrication of stainless steel material. A meeting was initially held to discuss the various requirements under RCRA. Inspections of the hazardous waste storage and disposal areas followed. A site sketch is attached.

As a result of the investigation, certain unsatisfactory features and items needing corrective action were noted, and are listed herein. A discussion section follows, explaining the nature of the problems in more detail. Finally, recommendations are presented for the company's reference in eliminating the problems and attaining compliance with the applicable provisions of RCRA.

UNSATISFACTORY FEATURES

1. Required records are not being kept.
2. No contingency plan has been prepared.
3. Personnel have not been trained in hazardous waste management procedures.
4. Site closure and post-closure plans have not been developed.
5. The drum storage area is not adequately contained.
6. A large residual sludge deposit remains on company property from past waste acid disposal activities.

DISCUSSION

Company staff have not been keeping any of the records specified in 40 CFR 265 Subparts B and E. Reference should be made to these portions

MISSOURI DEPARTMENT OF NATURAL RESOURCES  
8460 Watson Road St. Louis, Missouri 63119 (314) 849-1313

Christopher S. Bond Governor  
Fred A. Lafser Director  
St. Louis Regional Office

of the federal register for guidance. Specifically, a waste analysis plan and a written operating record need to be developed.

A contingency plan should likewise be developed as outlined in 40 CFR 265 Subpart D. Personnel training guidelines are covered in Subpart B. Site closure and post closure requirements are listed in Subpart G. Company personnel should give immediate attention to developing and implementing, as necessary, these plans.

A minor amount of leakage was noted around the present storage area, which is merely part of the back lot behind the plant. Immediate attention should be given to isolating the leaking drums and transferring the contents to containers in good condition. A perimeter berm or other suitable means of spillage containment should be constructed around the present drum storage area, or whatever area is selected as a future storage site, so as to prevent release of any hazardous constituents to the surrounding environment. The barrels observed during the inspection (containing waste solvents), and all future drums must also be appropriately labelled and manifested prior to off-site shipments for reprocessing, reclamation, or disposal. Reference should be made to Subpart I for a summary of waste container requirements.

A residual sludge deposit resulting from past waste acid disposal on company grounds behind the plant was documented during the inspection and also discussed with the plant representatives. The concern here is with respect to possible contamination of local surface water resources, since the waste deposit likely contains significant concentrations of heavy metals, and is situated in the floodplain of DuBois Creek, close to the confluence with the Missouri River. Mr. Colvin was advised to take representative samples of the residual material for TEP/heavy metal analyses. The site has now been identified as a potential hazardous waste site under state and federal guidelines, for appropriate follow-up. Final resolution will probably require a clean-up of the deposited material.

The waste acid holding basin was inspected and found to be in reasonably good condition relative to surface considerations. The basin was constructed as a no-discharge containment pond under a letter of approval dated March 18, 1976 from this Department. The basin was designed with a storage capacity of some 736,000 gallons to accommodate acid wastes generated by the company's electro-polishing operations, and thereby eliminate a previous discharge of process wastewater contaminants to waters of the state. This facility was originally also provided with two groundwater monitoring wells as a means of detection for possible subsurface leakage. Since the system is now covered under the surface impoundment criteria of RCRA, some additional considerations apply, primarily in terms of a stepped-up groundwater monitoring program. The groundwater program required is contained under Subpart F. This program must be developed and implemented by November 19, 1981. Should the company decide to phase out the electropolishing process and abandon further use of the acid holding basin, the closure and post-closure plans must specify exactly how the basin and contents remains will be eliminated and/or stabilized on-site. Again, the general closure and post-closure requirements are listed in Subpart G.

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27.020 Franklin County  
Hazardous Waste Generator  
IFES/SECO Products  
July 13, 1981

RECOMMENDATIONS

1. Maintain all records required under 40 CFR 265.
2. Develop a contingency plan as required in Subpart D. Provide copies of the plan to local authorities as specified. Be prepared to implement the plan as necessary.
3. Develop and implement a personnel training program as specified in Subpart B.
4. Develop adequate site closure and post-closure plans as outlined in Subpart G.
5. Eliminate all leakage in the present drum storage area. Provide adequate spillage containment for any storage sites. Properly manifest and label all off-site drum shipments.
6. Sample and analyze the residual sludge deposit left from earlier waste acid disposal practices.
7. Continue the good physical inspection and maintenance program for the waste acid surface impoundment.
8. Complete implementation of the groundwater monitoring program for the surface impoundment by November 19, 1981.

Should you have any questions concerning this report, contact Mike Duvall at the St. Louis Regional Office.

APPROVED:

*Bob Zeman*

Bob Zeman, P.E.  
Acting Regional Administrator  
St. Louis Regional Office  
Department of Natural Resources

SUBMITTED BY:

*Michael Duvall*

Michael Duvall  
Environmental Specialist II  
St. Louis Regional Office  
Department of Natural Resources

BZ/MD/jk

CC: Regional Office Program

## RCRA CHECKLIST FOR INSPECTION OF TSD FACILITIES

RO USE

Name of Facility: IFES/SECO Products

Inspection File

Address: P.O. Box 187

No. \_\_\_\_\_

Washington, MO 63090

Reviewer \_\_\_\_\_

EPA TSD ID Number: MO D068549492

Date reviewed \_\_\_\_\_

Facility Inspection Representative: Larry Colvin

Form "B"

Title: Plant Engineering CoordinatorTelephone: 314 239 4788

## SITE CHARACTERIZATION

(Please denote if the facility presently treats, stores, or disposes of hazardous waste. Also, mark the appropriate sub-category that occurs at the particular facility.)

## TREATER

## STORER

## DISPOSER

☐ Filtration  
☐ Incineration  
☐ Thermal Reduction  
☐ Recycling/Recovery  
☐ Chem/Phys/Bio Treatments  
☐ Waste Oil  
☐ Reprocessing  
☐ Solvent Recovery  
☐ Other \_\_\_\_\_

☐ Open Pile  
☒ Surface Impoundment  
☒ Drum  
☐ Above ground tank(s)  
☐ Below ground tank(s)  
☐ Other \_\_\_\_\_

☐ Landfill operation  
☐ Land treatment  
☒ Surface Impoundment  
☐ Incineration  
☐ Other \_\_\_\_\_

## INSPECTION PROCEDURE

1. Does the facility generate hazardous wastes?

Yes No

Note: Please complete the generator's checklist if TSD facility generates hazardous wastes which are disposed off-site.

2. Does the facility have in place a waste analysis plan?

Yes No

If so,

- A. Does the plan enable facility personnel to identify hazardous wastes being handled by the facility?

Yes No

- B. Does the plan enable facility personnel to confirm that wastes actually received at the TSD facility are the wastes indicated on the generator's manifest form?

Yes No

3. \*Does the TSD facility have a 24-hour surveillance system which monitors and controls entry to the active portion of the facility?

Yes No

- A. If not, does the facility have an artificial or natural boundary which surrounds active portions of the facility and; Yes No
- B. A means to control entry at all times, i.e., gates, attendants, locked entrances, etc.? Yes No
- (c) 4. \*Does the TSD facility have a restricted access sign posted at each entrance to the active portion of the facility? (An example would be: "Danger - Unauthorized Personnel Keep Out!") Yes No
- If no,
- A. Is the sign legible from a distance of 25 feet? Yes No
- B. Is the sign in English or any other foreign language predominant to the geographical area? Yes No
- d) 5. Does the TSD facility have an inspection log and a written schedule for inspecting all emergency equipment, security devices, and operating and structural equipment, important to the prevention, detection or response to environmental/human health emergencies? Yes No
- b) 6. Have facility personnel successfully completed a program of classroom training or on-the-job training in hazardous waste management procedures? Yes No *not formal*
- d) 7. Does the TSD facility maintain a record of job titles for personnel that are involved with hazardous waste management and the name of the employee filling each job? Yes No
- d)(2) 8. Does the TSD facility have on record a written position description for each job title noted in Question #6? Yes No
- d)(3) 9. Does the facility presently maintain a written description of the type and amount of introductory and continuing training for those employees noted in Question #6? Yes No
- a) 10. \*Does the TSD facility have installed the following equipment:
- A. An internal communications or alarm system capable of providing immediate emergency instructions to facility personnel if the hazardous waste storage area is threatened by fire or explosion? Yes No
- B. A device at the scene of hazardous waste TSD operations capable of summoning emergency assistance from Police, Fire departments, etc.? Yes No
- C. Fire control equipment and an adequate supply of fire fighting water or fire suppression chemicals? Yes *R* No
11. \*Does the TSD facility have adequate aisle space to allow the unobstructed movement of personnel and equipment during emergencies? Yes No

12. Does the facility have a contingency plan which contains the following elements:

A. A detailed description of emergency procedures facility personnel will implement in response to fires, explosions, or unplanned releases of hazardous wastes to air, soil, and water?

Yes

No

B. A detailed description of arrangements formally agreed to by local police, fire departments, and State and local emergency teams to provide assistance during emergency situations?

Yes

No

C. A listing of names, addresses, and phone numbers of the TSD facility emergency response coordinators?

Yes

No

Note: This listing should include names and phone numbers of emergency coordinators available on twenty-four hour basis.

D. A list of appropriate emergency equipment necessary to cope with emergencies at the TSD facility?

Yes

No

E. \*An evacuation plan for the TSD facility if Management believes such a plan is a definite requirement for their particular TSD facility?

Yes

No

13. Does the facility have at all times at least one employee either on-call or on the site who is responsible for coordinating all emergency response measures?

Yes

No

If so, please complete below:

Name: \_\_\_\_\_

Title: \_\_\_\_\_

Telephone Number: \_\_\_\_\_

14. Does the TSD facility have a written operating record which contains the following information:

A. A description and the quantity of each hazardous waste received and the method and date of treatment, storage or disposal?

Yes

N/A

No

B. The location of each hazardous waste within the facility and the quantity at each location?

Yes

No

C. Detailed records and results of waste analysis and treatability tests performed on wastes coming into the facility?

Yes

N/A

No

D. Detailed operating summary reports and description of all emergency incidents that required the implementation of the facility contingency plan?

Yes

No

E. Detailed records and results of inspections performed on facility emergency equipment, TSD systems, and hazardous waste areas?

Yes

No



5.73(b)  
(6)

F. Detailed monitoring, testing, and analytical data to insure compliance with the regulations?

Yes ☒ No

15. Have the TSD facility operators initiated the preparation of written closure and post closure plans in order to meet the May 1981 target date for implementation of these requirements?

Yes ☒ No

55.71

16. Does the TSD facility receive hazardous waste from off-site generators?

Yes ☒ No

If yes, are the following procedures implemented:

A. Manifest copies are signed and dated

Yes No

B. A copy is given to the transporter

Yes No

C. A copy is sent to the generator

Yes No

D. A copy is returned and filed at the TSD facility

Yes No

Note: These requirements do not pertain to onsite facilities unless such facilities also receive hazardous wastes from off-site sources.

5.90

17. Has the owner or operator implemented a groundwater monitoring program if surface impoundments, landfills or land treatment technologies are utilized at the facility?

Yes ☒ No

NOT NEEDED TILL  
NOV. 19, 1981

Note: Plan not required until one year after effective date of regulations..

18. The inspector should check for the following conditions at the TSD facility:

A. Open fires

Yes ☒ No

B. Fumes or gases

Yes ☒ No

C. Leaks or corrosion in containers or other storage structures

☒ Yes No

D. Leachate to receiving streams

Yes ☒ No

E. Malfunction of equipment

Yes ☒ No

F. Bulging drums

Yes ☒ No

G. Excessive heat generation from storage facilities, lagoons, storage piles, etc.

Yes ☒ No

19. Please provide detailed comments on specific problems encountered during the TSD facility inspection. For instance, industry requests for clarification of specific rules and regulations and their applicability at the facility can be noted below or described in a separate memo attached to the inspector's checklist.

1

Inspector's Name: Mike Drwall  
Title: Envr. Specialist  
Agency: MO DNR / DEQ  
Office location: St. Louis Reg. Office  
Date of Inspection: 6-10-81

spector's Name: Ken Gambaro  
 title: Env. Engineer  
 Agency: same as above  
 Office location: "  
 Date of Inspection: "

## RCRA Checklist for Use and Management of Containers

(Subpart I Section 265.170 - "General Operating Requirements")

R.O. USE

Inspection file No:

Name of Facility:

IFES / SECO Prods.

Address:

Reviewer:

Generator ID Number:

EPA ID #

M0N062549492

01585

Date Reviewed:

Facility Inspection Representative:

Form "I"

Phone:

Phone Number:

Questions contained in this checklist apply to owners and operators of all hazardous waste facilities that store containers of hazardous waste, except as Section 265.1 provides otherwise.

Regulations  
F.R.

2

71

1. Are all containers in good condition, i.e., not showing signs of leakage or corrosion or any other deterioration/deformation?

Yes

No

minor amount leakage

71

2. Are containers lined or made of materials compatible with hazardous wastes placed into them so that the container will not react or corrode with the hazardous wastes?

Yes

No

13(a)

3. Are all containers holding hazardous waste kept closed during storage?

Yes

No

open drums on 2 drums

14

4. Are areas where hazardous waste containers are stored inspected by the owner/operator at least once a week?

Yes

No

(d)  
(b)

5. Is an inspection log maintained? (See question #5 of TSD checklist.)

Yes

No

6

6. Are containers holding ignitable or reactive waste located at least 50 ft. from the facility's property line?

Yes

No

7(a)

7. Are incompatible wastes placed in the same container? (See Appendix 5 for examples.)

Yes

No

7(c)

8. Are storage containers holding hazardous wastes which are incompatible with nearby materials stored in containers, tanks, piles, or surface impoundments separated by dikes, berms, walls, or other devices?

Yes

No

N/A

Inspection file No: \_\_\_\_\_

Reviewer: \_\_\_\_\_

Date Reviewed: \_\_\_\_\_

Form "K"

(Subpart K Section 265.222 "General Operating Requirements")

Name of Facility: IFES / SECO Prods.

Address: \_\_\_\_\_

Generator ID Number: (EPA ID # MOD069549492) 01585

Facility Inspection Representative: \_\_\_\_\_

Title: \_\_\_\_\_

Telephone Number: \_\_\_\_\_

Questions contained in this checklist apply to owners and operators of facilities that have surface impoundments to treat, store, or dispose of hazardous waste, except as Part 261 provides otherwise.

C.F.R. -  
t:

- |                        |  |                                      |                                     |
|------------------------|--|--------------------------------------|-------------------------------------|
| 222                    | 1. Is 2 ft. of freeboard maintained in the surface impoundment?  | <input checked="" type="radio"/> Yes | <input type="radio"/> No            |
| 223                    | 2. Do all earthen dikes have protective covers (e.g., grass, shale or rock) to minimize wind and water erosion and to preserve dike structural integrity?  | <input checked="" type="radio"/> Yes | <input type="radio"/> No            |
| 225(a)<br>(1) &<br>(2) | 3. Are waste analyses conducted or written documentation obtained before placing a substantially different hazardous waste into a surface impoundment used for storage or treatment?   | Yes                                  | N/A                                 |
| 226(a)<br>(1)          | 4. Is the freeboard level inspected at least once each operating day?  | <input checked="" type="radio"/> Yes | <input type="radio"/> No            |
| 226(a)<br>(2)          | 5. Is the surface impoundment, including dikes and vegetation, inspected once per week to detect leaks or deterioration or failures in the impoundment?  | <input checked="" type="radio"/> Yes | <input type="radio"/> No            |
|                        | 6. Are the results of these inspections recorded in an inspection log or summary?  | Yes                                  | <input checked="" type="radio"/> No |
| 229(a)                 | 7. Are ignitable or reactive wastes stored in a surface impoundment: If so,  | Yes                                  | <input checked="" type="radio"/> No |
| 229(a)<br>(1)          | a) Is the waste treated, rendered, or mixed before or immediately after placement in the impoundment so that the resulting waste, mixture or dissolution of material no longer meets the definition of ignitable or reactive waste under parts 261.21 or 261.23 of the RCRA regulations? | Yes                                  | <input type="radio"/> No            |